

EXHIBIT 69

1 DEPOSITION OF LAURIE OLIVER

2 IN THE UNITED STATES DISTRICT COURT
3 FOR THE DISTRICT OF DELAWARE

4 THOMSON REUTERS ENTERPRISE
5 CENTRE GMBH and WEST
6 PUBLISHING CORPORATION,

7 Plaintiffs/
Counterdefendants,

8 vs. C.A. No.
9 ROSS INTELLIGENCE INC., 20-613-LPS

10 Defendant/
11 Counterclaimant.

12
13 HIGHLY CONFIDENTIAL PURSUANT TO THE PROTECTIVE
14 ORDER

15
16 VIDEOTAPED DEPOSITION OF LAURIE OLIVER

17 MINNEAPOLIS, MINNESOTA

18 March 30, 2022

19
20
21
22
23 Reported by:

24 KATHY L. STEWART

25 JOB NO. 208916

1 DEPOSITION OF LAURIE OLIVER

2

3

4

5 March 30, 2022

6 9:36 a.m.

7

8

9 Videotaped deposition of LAURIE OLIVER, held
10 at the offices of Regus, 100 S. Fifth
11 Street, Suite 1900, Minneapolis, Minnesota,
12 before Kathy Stewart, a Notary Public of the
13 State of Minnesota.

14

15

16

17

18

19

20

21

22

23

24

25

1 DEPOSITION OF LAURIE OLIVER

2 A P P E A R A N C E S:

3

4

5

6 KIRKLAND & ELLIS

7 Attorneys for Plaintiff

8 601 Lexington Avenue

9 New York, New York 10022

10 BY: JOSHUA SIMMONS, ESQ.

11

12

13 CROWELL & MORING

14 3 Embarcadero Center

15 San Francisco, California 94111

16 BY: KAYVAN GHAFFARI, ESQ.

17 DIANE AGUIRRE-DOMINGUEZ, ESQ.

18

19

20 ALSO PRESENT:

21 Jacob Arvold, Videographer

22

23

24

25

1 DEPOSITION OF LAURIE OLIVER

2 INDEX

3 EXAMINATION BY: PAGE

5 Mr. Ghaffari.....	8
6 Mr. Simmons.....	317
7 Mr. Ghaffari.....	325
8 Mr. Simmons.....	340
9 Mr. Ghaffari.....	341

10
11 EXHIBITS

12 Exhibit 1, Deposition Notice to Laurie Oliver,	page 11
13 Exhibit 2, Deposition Notice to Thomson Reuters Enterprise Centre GMBH,	page 11
15 Exhibit 3, Deposition Notice to West Publishing,	page 11
16 Exhibit 4, LinkedIn Page,	page 24
17 Exhibit 5, Plaintiffs and Counterdefendants Second Supplemental Responses and Objectiosn to Defendant and Counterclaimant's Interrogatory No. 1,	page 42
20 Exhibit 6, Classification and Routing Engine CaRE,	page 57
21 Exhibit 7, Summarization Manual, Judicial Editorial,	page 72
23 Exhibit 8, Editorial Manual, Policies and Guidelines for Headnoting,	page 75

24
25 EXHIBITS, CONTINUED

Page 5

1 DEPOSITION OF LAURIE OLIVER

2	Exhibit 9, Training Manual,	page 107
3	Exhibit 10, Features Widget Instructions,	page 175
4	Exhibit 11, Supreme Court Quality Level	
5	Agreement,	page 182
6	Exhibit 12, Native Document Placeholder	
7	TR-0044730 (Electronic Exhibit Contained on	
	USB Drive),	page 186
8	Exhibit 13, Native Document Placeholder,	
9	TR-0036335 (Electronic Exhibit Contained on	
	USB Drive),	page 186
10	Exhibit 14, West Key Number System,	page 214
11	Exhibit 15, American Digest Main Heads and	
12	Subdivisions of Classification Scheme, Fifth	
	Edition (April, 1916),	page 216
13	Exhibit 16, JCaRE Background,	page 236
14	Exhibit 17, Classifiers' Encyclopedia,	
15		page 256
16	Exhibit 18, Rogers v. Quiktrip Corp., 230	
	P.3d 853 (2010),	page 257
17	Exhibit 19, Memorandum #537,	page 269
18	Exhibit 20, Memorandum #12047,	page 275
19	Exhibit 21, Memorandum #5500,	page 278
20	Exhibit 22, Memorandum #,	page 288
21	Exhibit 23, Mutual Life Ins. Co. Of N.Y. v.	
22	Tailored Woman, 91 N.Y.S.2d 140 (1949),	
		page 291
23	Exhibit 24, Memorandum #803,	page 298
24	Exhibit 25, Memorandum #187,	page 299
25	EXHIBITS, CONTINUED	

Page 6

1 DEPOSITION OF LAURIE OLIVER

2 Exhibit 26, Memorandum #2820 , page 299

3 Exhibit 27, Memorandum #9169 , page 299

4 Exhibit 28, Memorandum #695 , page 299

5 Exhibit 29, Thomson Reuters Legal 2021
General Policies Addendum, page 309

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

1 DEPOSITION OF LAURIE OLIVER

2 VIDEOGRAPHER: This is the start of
3 media labeled number 1 of the video recorded
4 deposition of Laurie Oliver in the matter
5 Thomson Reuters Enterprise Centre GMBH,
6 et al., vs. Ross Intelligence Inc. in the
7 United States District Court for the
8 District of Delaware, Case Number 20-613
9 (LPS).

10 This deposition is being held at
11 100 South Fifth Street, 19th floor,
12 Minneapolis, Minnesota on March 30th, 2022.
13 The time is approximately 9:36 a.m.

14 My name is Jacob Arvold. I am the
15 legal video specialist from TSG Reporting,
16 Inc., headquartered at 228 East 45th Street,
17 Suite 810, New York, New York 10017.

18 The court reporter is Kathy Stewart
19 in association with TSG Reporting.

20 Counsel, please introduce
21 yourselves.

22 MR. GHAFFARI: My name is Kayvan
23 Ghaffari from the law firm of Crowell &
24 Moring, along with my colleague, Diane
25 Aguirre-Domingu, on behalf of Defendant/

1 DEPOSITION OF LAURIE OLIVER

2 Counterplaintiff Ross Intelligence Inc.

3 MR. SIMMONS: My name is Joshua
4 Simmons. With me is Jennifer Gibbins. We
5 are both from Kirkland & Ellis. We are also
6 joined by Jean-Pierre Giuliano from
7 Thomson Reuters, in-house counsel, and we
8 represent the Plaintiffs and the witness.

9 VIDEOGRAPHER: Will the court
10 reporter please swear in the witness.

11

12 LAURIE OLIVER,
13 called as a witness, was duly sworn and
14 testified as follows:

15

16 EXAMINATION

17 BY MR. GHAFFARI:

18 Q. Good morning, Ms. Oliver.

19 A. Good morning.

20 Q. How are you doing today?

21 A. I am good.

22 Q. Would you please state and spell your name
23 for the record.

24 A. Laurie Oliver, L-A-U-R-I-E O-L-I-V-E-R.

25 Q. And would you please also state your

1

DEPOSITION OF LAURIE OLIVER

2

Page 237

[REDACTED]

1 DEPOSITION OF LAURIE OLIVER

2

3 STATE OF MINNESOTA

4 CERTIFICATE

5 COUNTY OF RICE

6

7 I, Kathy Stewart, hereby certify that I
8 reported the deposition of LAURIE OLIVER on
9 the 30th day of March, 2022, and that the
witness was by me first duly sworn to tell
the truth and nothing but the truth
concerning the matter in controversy
aforesaid;

10 That I was then and there a Notary
11 Public in and for the County of Rice, State
12 of Minnesota; that by virtue thereof I was
duly authorized to administer an oath;

13 That the foregoing transcript is a
true and correct transcript of my
stenographic notes in said matter,
transcribed under my direction and control;

14 That the cost of the original has
been charged to the party who noticed the
deposition and that all parties who ordered
copies have been charged at the same rate
for such copies;

15 That the reading and signing of the
deposition was not waived;

16 That I am not related to nor an
employee of any of the attorneys or parties
hereto, nor a relative or employee of any
attorney employed by the parties hereto, nor
financially interested in the outcome of the
action and have no contract with parties,
attorneys or persons with an interest
in the action that affect or has a
substantial tendency to affect my
impartiality;

17 WITNESS MY HAND AND SEAL this 11th
day of April, 2022.

18 *Kathy Stewart*

19
20
21
22
23
24
25 Kathy Stewart

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

THOMSON REUTERS ENTERPRISE CENTRE
GMBH and WEST PUBLISHING
CORPORATION,

C.A. No. 20-613-LPS

Plaintiffs, Counterdefendants,

v.

ROSS INTELLIGENCE INC.,

Defendant, Counterclaimant.

**PLAINTIFFS THOMSON REUTERS ENTERPRISE CENTER GMBH
AND WEST PUBLISHING CORPORATION'S NOTICE OF ERRATA
FOR THE DEPOSITION OF LAURIE OLIVER**

I, the undersigned, do hereby declare that I read the deposition transcript of Laurie Oliver dated March 30, 2022 and that to the best of my knowledge, said testimony is true and accurate, with the exception of the following changes listed below:

Page	Line	Original Text	Replacement Text	Reason

Page	Line	Original Text	Replacement Text	Reason
Throughout	Redacted	Redacted	Redacted	Redacted

Dated: May 4, 2022

Laurie Oliver
Laurie Oliver